

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

MASTER DOCKET
18-MD-2865 (LAK)

This document relates to all cases.

DECLARATION OF NEIL J. OXFORD

I, Neil J. Oxford, hereby declare as follows:

1. I am a partner at Hughes Hubbard & Reed LLP, counsel for Plaintiff Skatteforvaltningen (“SKAT”) in this action. I am fully familiar with the matters set forth in this Declaration.

2. I submit this Declaration in support of SKAT’s letter motion asking the Court to enter the parties’ proposed Revised Amended Stipulated Protective Order Governing Confidentiality of Discovery Materials.

3. Attached hereto as “Exhibit 1” is the parties’ proposed Revised Amended Stipulated Protective Order Governing Confidentiality of Discovery Materials.

4. Attached hereto as “Exhibit 2” is a blackline reflecting the parties proposed amendments to the previously entered Amended Stipulated Protective Order Governing Confidentiality of Discovery Materials (No. 18-md-2865-LAK, ECF No. 287).

I, Neil J. Oxford, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
September 11, 2020

/s/ Neil J. Oxford
Neil J. Oxford